

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**SUNG-HO HWANG, CONSERVATOR OF  
THE ESTATE OF SEUNGICK CHUNG**

**CIVIL ACTION  
No. 1:14-cv-07187 KAM**

**V.**

**GRACE ROAD CHURCH (in New York, NY),  
GRACE ROAD CHURCH (in South Korea),  
OK-JOO SHIN**

**JULY 7, 2017**

**REQUEST FOR CERTIFICATE OF DEFAULT**

**TO: DOUGLAS C. PALMER  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Please enter the default of the defendants, GRACE ROAD CHURCH (in New York, NY), GRACE ROAD CHURCH (in South Korea), and OK-JOO SHIN for failure to plead or otherwise defend this action as fully appears from the court file herein and from the attached affirmation of Attorney Daniel P. Scholfield, Esq.

◆

Jonathan Silver, Esq. (7942)  
Local Attorney for the Plaintiff  
80-02 Kew Gardens Road  
Kew Gardens, New York 11415  
(718) 520-1010

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OK-JOO SHIN**

**JULY 7, 2017**

**AFFIRMATION OF ATTORNEY DANIEL SCHOLFIELD  
IN SUPPORT OF REQUEST FOR CERTIFICATE OF DEFAULT**

The undersigned, having first been duly sworn, deposes and states as follows:

1. I am of the age of majority, and understand and believe in the obligations of an oath. This affidavit is based upon my personal knowledge or my review of those documents in the custody of my office.

2. I am an attorney at the law firm of Lynch, Traub, Keefe & Errante, in New Haven, Connecticut, and am duly admitted to practice in the State of New York. I am admitted in the instant matter pro hac vice.

LYNCH, TRAUB, KEEFE AND ERRANTE, P. C. ATTORNEYS AT LAW  
52 TRUMBULL STREET P.O. BOX 1612 NEW HAVEN, CONNECTICUT 06506-1612  
TELEPHONE (203) 787-0275 FACSIMILE (203) 782-0278

3. I have been assigned to the instant matter since this office was retained by Sung-Ho Hwang in his capacity as conservator of the estate of Seungick Chung to bring an action on behalf of Mr. Chung.

4. On July 8, 2016, Defense Counsel filed a Letter Motion for Leave to File a Motion to Withdraw as Counsel, in which Defense Counsel sought leave to file a Motion to Withdraw if he did not receive a response to correspondence he had sent to his client. (Doc. No. 70). The Court granted Counsel's request to wait three weeks.

5. Thereafter, on July 29, 2016, Defense Counsel filed a second Letter Motion for Leave to Withdraw as Counsel (Doc. No. 71), noting that he had received no response from his client.

6. On August 9, 2016, the Court granted Defense Counsel's Motion for Leave to Withdraw. Thereafter, on August 31 and September 14, Defense Counsel filed Certificates of Service of the Court's Order on his client (Doc. Nos. 72 & 73, respectively).

7. To date, no new counsel has appeared for the Defendants.

8. To date, the individual defendants have not participated in the case, and have made no attempt to participate in the case.

9. The Defendants are not, to the best of my knowledge and belief, in the service of the military of the United States.

10. The Plaintiff, who suffered the amputation of his leg and severe exacerbation of existing schizophrenia and psychosis after he was duct taped to a bed for day whilst the Defendants attempted to cure him of his mental disease by removing him from his medication, has demanded damages in the amount of six million dollars (\$6,000,000.00).

11. The following is, to the best of my knowledge and belief, a true and accurate accounting of fees, expenses, and costs incurred by my firm in the course of our representation in this matter:

<b>Date.</b>	<b>Description.</b>	<b>Amount.</b>
05-06-14	LexisNexis research – April 2014	\$76.97
06-05-14	LexisNexis research – May 2014	\$67.79
08-19-14	Service of Subpoena – Domovsky Lawyer Service	\$116.00
08-20-14	LexisNexis research – July 2014	\$70.74
09-05-14	Mileage to Trinity Hill Heath Center (health facility at which Mr. Chung was residing)	\$34.14
09-10-14	Site Inspection – Domovsky Lawyer Service	\$140.19
09-10-14	FedEx – Delivery to Domovsky Laywer Service	\$8.55
09-18-14	Investigative Services – Personal Protection Services	\$657.65
09-19-14	Service of Subpoena – Domovsky Lawyer Service	\$116.00

09-24-14	LexisNexis people search	\$8.36
12-01-14	Photocopy recovery	\$4.20
12-02-14	Tolls/ Parking Garage, NYC	\$62.00
12-17-14	Certificates of good standing, CT Superior Court	\$30.00
12-30-14	Pro Hac Vice Admission Fees, EDNY	\$600.00
01-22-15	LexisNexis research – December 2014	\$56.16
01-23-15	Transcripts – U.S. Legal Support	\$706.30
02-05-15	LexisNexis research – January 2015	\$89.94
03-25-15	Video – Geomatrix Productions	\$732.99
04-13-15	LexisNexis research – February 2015	\$126.59
05-18-15	Investigator in Korea, Youngjin Noh, for property search	\$780.00
06-11-15	FedEx – delivery to Sheila Butch, transcriptionist	\$14.74
06-17-15	Transcripts – Sheila Butch	\$240.00
07-08-15	LexisNexis research – June 2015	\$142.41
08-18-15	Investigative services – Personal Protection Services	\$1048.70
08-19-15	Recordings of probate hearings – Treasurer, State of Connecticut	\$25.00
10-15-15	Mileage to Hartford Probate Court	\$16.69

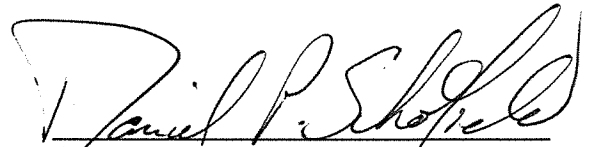
12-01-15	FedEx – delivery to USDC, EDNY	\$15.43
03-03-16	Photocopy recovery	\$14.20
05-10-16	Westlaw research – March 2016	\$6.85
	<b><u>TOTAL</u></b>	<b><u>\$6029.92</u></b>

WHEREFORE, the Plaintiff, SUNG-HO HWANG, CONSERVATOR OF THE ESTATE OF SEUNGICK CHUNG, requests that the default of the defendants, GRACE ROAD CHURCH (in New York, NY), GRACE ROAD CHURCH (in South Korea), and OK-JOO SHIN, be noted and a certificate of default issued.

LYNCH, TRAUB, KEEFE AND ERRANTE, P. C. ATTORNEYS AT LAW  
 52 TRUMBULL STREET P.O. BOX 1612 NEW HAVEN, CONNECTICUT 06506-1612  
 TELEPHONE (203) 787-0275 FACSIMILE (203) 782-0278

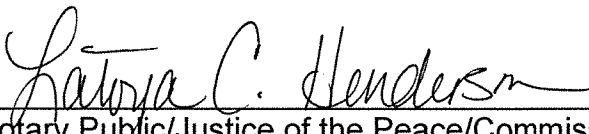
I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

FURTHER affiant sayeth not.

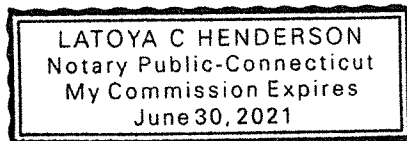
  
Daniel P. Scholfield, Esq.

STATE OF: Connecticut  
COUNTY: New Haven

On this 7th Day of July, 2017, personally appeared before me, Daniel P. Scholfield, Esq., signer and sealer of the foregoing affidavit, and acknowledged the same to be his free act and deed before me.

Signed:   
Notary Public/Justice of the Peace/Commissioner of Court

Printed Name: Latoya C. Henderson



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GRACE ROAD CHURCH (in South Korea),  
OK-JOO SHIN**

**JULY 7, 2017**

I, Douglas C. Palmer, Clerk of Court of the United States District Court for the Eastern District of New York, do hereby certify that the Defendants, GRACE ROAD CHURCH (in New York, NY), GRACE ROAD CHURCH (in South Korea), and OK-JOO SHIN, have not filed an answer or otherwise moved with respect to the complaint herein. The default of the Defendants, GRACE ROAD CHURCH (in New York, NY), GRACE ROAD CHURCH (in South Korea), and OK-JOO SHIN is hereby noted pursuant to Rule 55 (a) of the Federal Rules of Civil Procedure.

Dated: , New York  
, 2017

DOUGLAS C. PALMER, Clerk of Court

By: \_\_\_\_\_  
Deputy Clerk